Ministry
of Digital Affairs

Michał Gramatyka
Secretary of State

DT.WUKE.442.1.2024
Warsaw, 27th September 2024

Apple Inc.
Government Affairs Europe

Dear Sir or Madam,

I am writing in the matter of the Emergency via Satellite service provided using handheld terminal devices in the public mobile telecommunications network. We identify a problem such that when attempting to establish a call to an emergency number from the national list of emergency numbers other than 112, the call may not be made due to the lack of a user connection to the home network to which the IMSI of the SIM card is assigned, or the lack of a SIM card at all, or the lack of connection to any mobile network. The above results from the technical standard 3GPP TS 22.101 and is consistent with the GSMA NG.119 report. In the specification for IOS, in the section on Emergency SOS (satellite link), it is indicated that Apple devices can connect to a defined emergency number using satellite communication in the absence of logging in to the native terrestrial mobile telecommunications network. The provisions on your website https://support.apple.com/pl-pl/HT213426#availability show that establishing such communication is possible in some countries, e.g. to the numbers 15, 17, 18, 114, 119, 191 and 196 in France, 110 in Germany and 999 in Ireland. **I would like to ask you to consider launching such a service in Poland, at least for the unified European emergency number 112.** If Apple Inc. consents to launch such functionality, please provide us with information on the necessary steps to launch such functionality.

We notice the essence of the problem primarily when calling emergency numbers in areas with limited access to the user's home mobile network. The flash floods that have recently hit Central Europe, including Poland, show that the terrestrial telecommunications infrastructure of all operators may be disabled by natural disasters.

The legal and technical arrangements made by Apple Inc. with the Ministry of Digital Affairs team to date have resulted in the entry into force of a new technical regulation on December 12, 2023, enabling the use of S-PCS devices in Poland (https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230002567). For the launch of this service in Poland, we have created a legal framework by specifying in the implementing act a reference to decisions ECC/DEC(09)04 and ECC/DEC/(12)01. Decision ECC/DEC(09)04 applies to broadcast-only terminals (IoT) operating in the 1613.8-1626.5 MHz band. Decision ECC/DEC(12)01 also covers this frequency band, but allows for the free flow and use of bidirectional terminals. In addition to covering the 1613.8-1626.5 MHz transmit band, it also covers the 2483.5-2500 MHz terminal receive band.

telephone: +48 22 245 59 17
email: Sekretariat.DT@cyfra.gov.pl
www.gov.pl/web/cyfryzacja

adress: ul. Królewska 27
00-060 Warsaw

I express hope that Apple Inc. will launch the Emergency via Satellite service in Poland, which will contribute to saving human life and health in areas without mobile telephony coverage and in areas affected by serious natural disasters. According to recent research, the share of smartphones with the iOS operating system in Poland is about 19% of the overall smartphone market, so it is a significant market for Apple Inc. (https://ranking.gemius.com/pl/ranking/systems/).

In case of necessity to make arrangements of technical or legal nature, the team of the Ministry of Digital Affairs of Poland is at your disposal. In matters of strategic nature, I recommend contacting Ms. Marzena Sawicka, Director of the Department of Telecommunications (marzena.sawicka@cyfra.gov.pl) or Tomasz Opolski, Deputy Director of the Department of Telecommunications (tomasz.opolski@cyfra.gov.pl). In matters of technical or legal nature, I recommend contacting Artur Potocki, Counselor in the Department of Telecommunications (artur.potocki@cyfra.gov.pl).

Best regards,

Michał Gramatyka
Secretary of State
in the Ministry of Digital Affairs
/document signed electronically/

telephone: +48 22 245 59 17
email: Sekretariat.DT@cyfra.gov.pl
www.gov.pl/web/cyfryzacja

adress: ul. Królewska 27
00-060 Warsaw